

Passaic, Hackensack and Newark Bay Remediation Branch Weekly Report
July 22, 2020
Enforcement Confidential

RA or DD updates for the week of July 27, 2020:

Hot Issues:

Past Week:

Upcoming: Riverside Industrial Park: The Proposed Plan is scheduled to be released on July 22, with a virtual public meeting to be held on August 5.

Regional Administrator's Pending Action Items:

<u>Subject</u>	<u>Date Sent to RA's Office</u>	<u>Required By/Due Date</u>	<u>Comments</u>

Other Items of Special Interest:

Non-RA Highlights:

Events List:

<u>Event Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Region</u>	<u>Event Type</u>	<u>Description</u>	<u>City</u>	<u>State</u>

Milestone Tracker:

<u>Site</u>	<u>Milestone</u>	<u>Project Manager</u>	<u>Projected Date</u>
Diamond Alkali OU4	PRAP	Diane Salkie	2020/4
Riverside Industrial Park	ROD	Josh Smeraldi	2020/4

Diamond Alkali OU1 (Lister Avenue):

- Site Evaluation Report Addendum comments from EPA and NJDEP submitted to GSH.
 - Submittal of Revised Remedy Evaluation Report – 6 weeks from approval of Site Evaluation Report Addendum.
- GSH submitted revised and updated DASS Operation and Maintenance QAPP
- FYR draft available on SharePoint
- EPA approved the following facility for waste disposal event on July 14:
 - Clean Harbors El Dorado I Incineration Facility

Diamond Alkali OU2 (8.3 miles):

- Letter sent on 7/16 to the Corps of Engineers-NY District laying out why we don't think they have justified their request for a five-foot allowance between the bottom of the navigation channel and the top of cap (which is a change from the three-foot allowance assumed in the OU2 ROD). We will propose a call to discuss next steps within the next two weeks.
- PSE&G sampling to delineate manufactured gas plant (MGP) product in the river continues. Near former Front Street plant, oily material is found in the layer of coarse sediments just above the native sediments, approximately 5 to 15 feet below ground surface (deeper going north).

Diamond Alkali OU3 (Newark Bay Study Area):

- Revised final BERA submitted Thursday July 21
- EPA submitted additional clarification requested on PRG-RAO memo comments
- Submitted comments on GSH Identification of Candidate Technologies and Technology on Screening Technical Memo on 7/2. NJDEP was not able to submit comments
- Received comments from ORC and PHNBRB Branch Chief on draft Shooters Island Memo, memo is being revised to include comments
- GSH submitted complete NBSA RI document on 7/10, links with document and appendices have been provided to EPA staff, NJDEP, NYSDEC, USFWS and NOAA for review and comment.
- **Exemption 5, Deliberative/Pre-decisional**
[REDACTED]

Diamond Alkali OU4 (17-Mile):

- **Exemption 5, Deliberative/Pre-decisional**
[REDACTED]
- Submitted EPA and some of NJDEP comments on the CPG's RTC file on the draft revised IR FS to the CPG.
- Addressed comments from Chloe and ORC draft Proposed Plan.
- Submitted the draft PRAP to HQ for a technical review on 7/20. A call is scheduled for 7/23 with HQ to discuss any technical fatal flaws with the region's preferred alternative and rationale.

Universal Oil Products:

- RD workplan addenda submitted July 13th. Anticipate one-month review.
- Vapor intrusion report reviewed by Lora, I still have to complete and send comments.
- Honeywell submitted a revised QAPP, but it was not in UFP-QAPP format for GW discharge monitoring plan. Not having oversight contractors review it as LSAD will not either.

Berry's Creek Study Area:

- Received updated document tracking table from ELM.
- Rebuild by Design tasking WSP to evaluate sediment scour from the pump station discharge. Not sure of timing because of NJDEP furloughs. Meeting scheduled for July 23rd.
- Baseline Monitoring water and fish sampling in August. Plan under review.
- Will send a letter to State of New Jersey to assist with obtaining information regarding bridges in project area.

- PRP group submitted a request for additional supporting information to the SCORPIOS report. This is common, and a request has been made to John Koechley to prepare the SPYDER report. Reporting system down for another week. Michael is responding to BCSA Group.

Ventron/Velsicol:

- No comments on warehouse construction document. Revised O&M plan needs a UFP-QAPP (currently in old format). We will approve work completed and work out new OM&M plan after September 30th.

Standard Chlorine:

- RD: On July 14, sent final comments in redline on Final (100%) RD main text and ARARs table.
- O&M: Ongoing.
- Anthony Pilawski, Section Chief, Bureau of Pretreatment and Residuals responded with no legal contact and no management update on 121e permit exemption issue; he forwarded NJDEP's Sharkey's Landfill draft permit.
- Redevelopment:
 - On July 9, discussed EPA's June 23 comments on Morris/TRC on revised RA Work Plan Addendum with developer Keith Morris. Keith said he would have TRC make all changes per EPA redline and copy EPA on formal submittal to NJDEP.
 - Chemical and geotechnical analyses for Pre-Design Investigation for replacement slurry wall expected by end of July/early August. Preliminary Design expected August/September.
 - Next redevelopment fieldwork plan anticipated to be submitted by/through KEY is sewer/water; scope of work currently in discussions among HCIA/Morris, Kearny Municipal Utilities Authority, NJ Transit. Other redevelopment components for EPA review will be Spine Road, stormwater, sewer force main, Building 3 construction.
 - Closing date for Koppers property transfer has moved ahead a month to July 15 due to COVID (HCIA to Morris).

Pierson's Creek:

- EPA has conditionally approved the draft RI and BHHRA as long as Troy accepts all of our latest comments. The approval letter went out on 6/18/20. Conference call held on 7/20/20 to discuss several comments with Geosyntec. Revised final RI expected by 9/21/20.
- A conference call was held on 6/23/20 with Troy to discuss the RAOs. The revised RAOs were sent to Geosyntec on 6/29/20. Geosyntec said on 7/20/20 that Troy is still reviewing them and will get back to us. The GW restoration RAO and migration from ditch RAO are the two sticking points.
- Received the draft SOW and AOC back from 429 Delancy on 9/17/19. A call was held with 429 Delancy on 11/20. Received the latest draft AOC from Amelia on 3/24 for review. 429 Delancy is not happy with this latest revision and is preparing a response. On 6/15/20, EPA received 429's redline strikeout. 429 has been given permission to rent their fenced in paved area of their property. EPA will continue to have access as needed for PFAS sampling.
- The Troy invoice was sent out on 4/27/20. Troy requested and received a 30-day extension for payment and they also have some questions about the SCORPIOS report. ORC sent a response to Troy on 6/3/20 answering their questions on the SCORPIOS. Have not received notification that this payment has been sent to EPA.
- The future buyer (Salomone) of the Globe Metals (Oberwill) property performed construction on the site and dug up the unnamed tributary adjacent to Globe/Troy and replaced it with piping and drainage features. The Oberwill and Salomone notice letters were sent out on 4/20/20. A conference call was held on 5/7/20 to discuss. CDM assessed the soil stockpiles on 5/5/20 to

determine if additional stabilization measures are necessary. Not all the piles are fully covered. We will have CDM sample the piles for disposal and have RCRA determine if the piles are considered hazardous or non-hazardous. Salomone has told ORC that they want to stabilize the piles under an Order with EPA. Exemption 5, Attorney client communication; Attorney work product; Deliberative/Pre-decisional; Exemption 7(a), Enforcement

[REDACTED] NJDEP will be sending a NAV to Salomone and/or Oberwill shortly.

- Working on the RAF contracting for the OU1 FS work. CO sent a letter CDM on 7/13/20 asking them for their proposal by 8/12/20.

Riverside Industrial Park:

- We conditionally approved the FS on 6/22 and since then we had several discussions with PPG on finalizing the FS. Additionally, we provided an updated RLSO to provide supporting information on our factual findings. We had further discussions with PPG and gave specific instructions on finalizing the FS on 7/16 and 7/17. We believe our changes as part of the conditional approval are sufficient and appropriate to finalize the document and any concerns can be submitted by PPG during the comment period. PPG resubmitted the FS on 7/17 and we reviewed but it continued to be deficient in that it does not address all of our edits/comments and it proposed new changes. We decided to exercise our option to modify the FS, as allowed in the AOC. The FS was completed by EPA on 7/20 and a letter was sent to PPG on 7/21.
- During a call on 7/17, PPG mentioned that they will file for dispute resolution. Their primary concern is that EPA determined that lead is a site related contaminant for groundwater. PPG believes lead in groundwater is associated with historic fill and not a site related contaminant.
- The Technical Support team, ORC, management, and HQ have all reviewed and provided comments on the proposed plan. The final proposed plan will be published on July 22nd and this will start the public comment period.
- The public comment period will start on 7/22 and end 8/21. However, the Passaic CAG has already mentioned that they would like to extend the public comment period. If an extension is added the comment period would end 9/21.
- The public meeting is planned for Wednesday August 5th.
- A community involvement plan has been completed and will be released with the proposed plan.

Scientific Chemical Processing (SCP):

- Draft Final Remedial Design report was submitted on 7/20 and distributed for review to Technical Support Section and LSASD (formerly DESA). Comments are requested by August 13, in order for there to be time for revisions, submittal of Final Remedial Design report and EPA approval before end of fiscal year.